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THE RECORDING ACADEMY®

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ADVOCACY & GOVERNMENT RELATIONS

November 7, 2011

**VIA ELECTRONIC FILING**

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

Re: MB Docket No. 04-233	In the Matter of Broadcast Localism
MB Docket No. 07-294	In the Matter of Promoting Diversification
	of Ownership in the Broadcasting Services
MB Docket No. 09-182	Quadrennial Regulatory Review - Review of
	the Commission's Broadcast Ownership
	Rules Adopted Pursuant to Section 202 of
	the Telecommunications Act of 1996

**NOTICE OF EX PARTE PRESENTATION**

Dear Ms. Dortch:

This letter is submitted on behalf of the Recording Academy. The Recording Academy represents the interests of music creators. Its members include nearly 20,000 recording artists, songwriters, and studio professionals, and is internationally known for its presentation of the GRAMMY Awards which honor outstanding achievements in music. Americans rely upon local broadcast radio stations -- commercial and non-commercial -- to hear music-related programming created by our members in the artists' communities. This airplay has been integral for the ability of listeners to have music heard and enjoyed throughout their communities, throughout the nation and the world. Non-commercial stations have been especially important outlets for showcasing local music talent.

Broadcasting local artists' music is an important aspect of those stations' public interest obligations. It is also a critical component of broadcast localism. As the Commission noted in its 2008 Report on Broadcast Localism and Notice of Proposed Rulemaking (23 FCC Rcd 1324)), the Commission seeks to promote localism to provide listeners with access to locally responsive programming "including, but not limited to,

local news and public affairs matter.” (§ 2). The Commission’s conscientious inclusion of the words “including, but not limited to” indicate that the Commission wisely deems locally responsive programming to include more than news and public affairs. Local entertainment programming is an important part of local broadcasting.

Because of these factors, the Recording Academy is concerned about the recent increase in the transfer of local non-commercial educational stations to entities with no local ties to their communities of license. For example, we have become aware of situations where colleges and universities have had their non-commercial educational station licenses transferred or assigned to out-of-town entities that have no affiliation with either the college or university or the local community. Even where those acquiring entities are themselves qualified educational organizations, the transfer of such stations results in a deprivation of local programming, including local music programming. Such licenses transfers and assignments are antithetical to the goals of broadcast localism which has long been a hallmark of the Commission’s public interest goals.

For these reasons, the Recording Academy respectfully urges the Commission to promptly commence a thorough review of the trends in ownership and control of non-commercial broadcast stations, and that it not approve the assignment or transfer of such stations to non-local entities unless and until the prospective acquirers have made satisfactory demonstrations that the acquisitions will not result in a reduction of locally response programming, including local music entertainment programming.

The Recording Academy and its members are prepared to participate actively in such a review and to provide the Commission with input to assist it in evaluating the impact of changes in licensing and operation of such stations on broadcast localism.

Sincerely,

A handwritten signature in black ink, appearing to read "Daryl", followed by a long horizontal flourish line.

Daryl P. Friedman  
Chief Advocacy and Industry Relations Officer